

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	
Alex Cassis	:	Chapter 13
Debtor(s)	:	Case No.: 20-14301-ELF

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MOTION TO VACATE ORDER GRANTING RELIEF

Debtor, Alex Cassis, by and through Attorney Brad J. Sadek moves this Honorable Court to vacate the April 27, 2021 Order Granting Relief from the Automatic Stay to U.S. Bank, N.A. and in support thereof avers the following:

1. The above captioned bankruptcy matter was filed on October 30, 2020.
2. Creditor, U.S. Bank, N.A., filed a Motion for Relief of the Automatic Stay on April 1, 2021 in regards to the debtor's property located at 5001 Hawthorne Street Philadelphia, PA 19124.
3. On April 26, 2021, U.S. Bank, N.A. entered a Certificate of No Response due to the debtor's failure to respond to the Motion for Relief.
4. On April 27, 2021, the debtor reached out to counsel to aver all payments had been made to date. Debtor's counsel filed a late Response to the Motion for Relief.
5. An Order was entered on April 27, 2021 granting relief from the Automatic Stay to U.S. Bank, N.A.
6. Debtor avers all payments have been made to date or will be brought current by the Hearing date for this Motion.
7. Debtor's counsel will request full post-petition accounting for the exact balance necessary to bring the account current to date.

8. The debtor wishes to retain his property located at 5001 Hawthorne Street Philadelphia, PA 19124 and knows that he must remain current in order to avoid any future attempts by U.S. Bank, N.A. to modify the Automatic Stay.

WHEREFORE, Debtor respectfully requests this Honorable Court to vacate the Order Granting Relief from the Automatic Stay in regards to the property located at 5001 Hawthorne Street Philadelphia, PA 19124.

Respectfully submitted,

Dated: May 6, 2021

/s/ Brad J. Sadek, Esquire  
Brad J. Sadek, Esquire  
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